

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

CORETHA SNEED	:	VIOLATIONS:	18 U.S.C. § 371
ISHTAR GADSON			(Conspiracy to commit
MICHAEL ANDERSON			an offense against the
NAKEISHA DAVIS			United States - 1
KATISHA DEVAN			Count)
NICOLE GUIONS			18 U.S.C. § 666 (Theft
KEYSHARINA HURTT			concerning a program
VERNELL DEVAN			receiving federal funds
ADRIENNE ALBRIGHT			- 13 Counts)
MONICA HANNAH			
ALICIA SANCHEZ			
ERRICKA PENDER			
TANYA WILLIAMS			
DORIS McCULLOUGH			
CHARLES MOORE			
KIM GIPSON			

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

At times material to this Indictment:

**The Voucher Program**

1. The Department of Housing and Urban Development (HUD) was the federal government agency charged with providing and regulating federal funding for housing, including low-income housing.

2. The Philadelphia Housing Authority (PHA) was the public housing authority charged with providing housing in accordance with HUD rules and regulations in the Philadelphia area.

3. PHA was an organization which received benefits in excess of \$10,000 in any one-year period under a federal program involving grants, subsidies, and other forms of federal assistance.

4. “Housing Choice” was a program, also known as Section 8, which was funded by HUD and administered in the Philadelphia area by PHA. Through “Housing Choice,” PHA provided rental assistance to low-income families in privately owned housing.

5. The HUD Housing Choice Voucher Program (Voucher Program) was a federal government program for assisting low-income families, the elderly, and the disabled afford decent, safe, and sanitary housing in the private market.

6. In the Voucher Program, HUD paid rent and utility subsidies so eligible families could afford decent, safe and sanitary housing. In the Philadelphia area, the Voucher Program was administered by PHA. HUD provided housing assistance and administration funds to PHA.

7. Under the Voucher Program, PHA maintained a waiting list of eligible applicants; maintained information that permitted PHA to select participants from the waiting list in accordance with PHA admission policies; conducted credit and background checks of

applicants; reviewed applications of the Housing Choice program; certified program eligibility of applicants; selected participants in accordance with admission policies in the PHA administrative plan; inspected and certified that housing units met Housing Quality Standards and approved units for leasing and contracts; determined the amount of Housing Assistance Payments to landlords on behalf of families, and made such payments; conducted annual recertifications for continued eligibility for participants; and monitored program performance and compliance of landlords and families.

8. With few exceptions, families were selected by PHA for inclusion into the Voucher Program by the use of periodic lottery drawings known as "wait list pulls." Throughout 2001, there were approximately 27,000 applications in the applicant pool awaiting Section 8 housing subsidies.

9. When a family was selected by the lottery, PHA issued an appointment letter for the family to obtain a voucher. Once the voucher was issued, the family would then have an extendable 60-day period to search for a housing unit. If the family found a housing unit, and the owner was willing to lease the unit under the Voucher Program, the family would request PHA approval.

10. If PHA approved, PHA would enter into a Housing Assistance Payments (HAP) contract with the owner, in which HUD, through PHA, would pay a monthly rent subsidy to the owner on behalf of the family from the federally funded Voucher Program. In some cases, PHA would also pay a monthly utility subsidy directly to the family from the federally funded Voucher Program. (Rent and utility subsidies are hereafter referred to collectively as "housing subsidies.")

### **Charmaine Mabry as a PHA Official**

11. Charmaine Mabry, charged elsewhere, was employed by PHA as a Section 8 Eligibility Department clerk.

12. Charmaine Mabry's responsibilities included initiating criminal background checks on potential recipients of Section 8 benefits to screen out ineligible persons.

13. Charmaine Mabry also was responsible for accessing the PHA computer database on persons on the Section 8 wait list and making appropriate entries regarding criminal histories of potential clients.

14. From in or about April or May 2001 to in or about at least August 2002, in the Eastern District of Pennsylvania and elsewhere, defendants

CORETHA SNEED  
ISHTAR GADSON  
MICHAEL ANDERSON  
NAKEISHA DAVIS  
KATISHA DEVAN  
NICOLE GUIONS  
KEYSHARINA HURTT  
VERNELL DEVAN  
ADRIENNE ALBRIGHT  
MONICA HANNAH  
ALICIA SANCHEZ  
ERRICKA PENDER  
TANYA WILLIAMS  
DORIS McCULLOUGH  
CHARLES MOORE  
KIM GIPSON

conspired and agreed with each other, and with Charmaine Mabry and others known and unknown to the grand jury, to commit an offense against the United States, that is, to embezzle, steal, obtain by fraud, and otherwise without authority knowingly convert to the use of a person

other than the rightful owner, and intentionally misapply, property valued at \$5,000 or more, that is money, in the form of monthly housing subsidies paid on behalf of, and directly to, the co-conspirators described above, which money was owned by and under the care, custody and control of PHA, in violation of Title 18, United States Code, Sections 666(a)(1)(A) and (b).

#### MANNER AND MEANS

15. It was a part of the conspiracy that Charmaine Mabry solicited and accepted money from defendants in her role as an agent and employee of PHA, in exchange for bypassing the Section 8 lottery wait list system and causing appointment letters to be generated and provided to defendants to enable defendants to obtain vouchers for housing and housing subsidies under the Voucher Program to which they were not then entitled.

16. It was a part of the conspiracy that Charmaine Mabry paid referral fees to defendants who brought to Charmaine Mabry others willing to pay for vouchers and housing subsidies under the Voucher Program to which they were not then entitled.

#### OVERT ACTS

In furtherance of the conspiracy, defendants CORETHA SNEED, ISHTAR GADSON, MICHAEL ANDERSON, NAKEISHA DAVIS, KATISHA DEVAN, NICOLE GUIONS, KEYSHARINA HURTT, VERNELL DEVAN, ADRIENNE ALBRIGHT, MONICA HANNAH, ALICIA SANCHEZ, ERRICKA PENDER, TANYA WILLIAMS, DORIS MCCULLOUGH, CHARLES MOORE, and KIM GIPSON, and Charmaine Mabry, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. In or around April or May 2001, an individual unknown to the grand jury told defendant CORETHA SNEED about Charmaine Mabry's scheme.

2. In or around April or May 2001, defendant CORETHA SNEED provided her telephone number to an individual unknown to the grand jury and told this individual to provide her name and telephone number to Charmaine Mabry in order for SNEED to obtain a Section 8 voucher through Charmaine Mabry.

3. On or about May 14, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant CORETHA SNEED.

4. On or after May 14, 2001, defendant CORETHA SNEED paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to SNEED.

5. In or around May 2001, Charmaine Mabry told defendant CORETHA SNEED that she would pay referral fees to SNEED for referring others to Charmaine Mabry for the purpose of paying for Section 8 vouchers.

6. In or around May 2001, defendant CORETHA SNEED provided the names and telephone numbers of defendants ISHTAR GADSON and KATISHA DEVAN to Charmaine Mabry in order for GADSON and DEVAN to obtain Section 8 vouchers through Charmaine Mabry.

7. On or about May 29, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant ISHTAR GADSON.

8. On or after May 29, 2001, defendant ISHTAR GADSON paid \$500 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to GADSON.

9. On or before May 29, 2001, an individual known to the grand jury, a coworker of defendant CORETHA SNEED, referred defendant MICHAEL ANDERSON to Charmaine Mabry in order for ANDERSON to obtain a voucher through Charmaine Mabry.

10. On or about May 29, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendants MICHAEL ANDERSON and NAKEISHA DAVIS.

11. On or after May 29, 2001, defendant MICHAEL ANDERSON paid \$600 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to NAKEISHA DAVIS.

12. On or about June 4, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant KATISHA DEVAN.

13. On or after June 4, 2001, defendant KATISHA DEVAN paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to defendant KATISHA DEVAN.

14. On or after June 4, 2001, Charmaine Mabry told defendant KATISHA DEVAN that she would pay referral fees to defendant KATISHA DEVAN for referring others to Charmaine Mabry for the purpose of paying for Section 8 vouchers.

15. On or before June 8, 2001, defendant KATISHA DEVAN provided the names and telephone numbers of defendants NICOLE GUIONS and ADRIENNE ALBRIGHT to Charmaine Mabry in order for GUIONS and ALBRIGHT to obtain a Section 8 vouchers through Charmaine Mabry.

16. In or about June 2001, defendant ADRIENNE ALBRIGHT gave approximately \$1,000 to defendant KATISHA DEVAN in order for defendant KATISHA DEVAN to pay for an appointment letter on behalf of ALBRIGHT.

17. On or about June 8, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant ADRIENNE ALBRIGHT.

18. On or after June 8, 2001, defendants KATISHA DEVAN and VERNELL DEVAN paid Charmaine Mabry \$950 for an appointment letter for defendant ADRIENNE ALBRIGHT, and Charmaine Mabry paid defendants KATISHA DEVAN and VERNELL DEVAN a \$150 referral fee.

19. On or about June 8, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant NICOLE GUIONS.

20. On or after June 8, 2001, defendant NICOLE GUIONS paid at least \$600 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to GUIONS.

21. On or before June 12, 2001, defendant KATISHA DEVAN provided the name and telephone number of defendant KEYSHARINA HURTT to Charmaine Mabry in order for HURTT to obtain a Section 8 voucher through Charmaine Mabry.

22. On or about June 12, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant KEYSHARINA HURTT.



23. On or after June 12, 2001, defendant KEYSHARINA HURTT paid at least \$400 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to defendant KEYSHARINA HURTT.

24. On or before June 13, 2001, defendant VERNELL DEVAN explained Charmaine Mabry's scheme to defendant MONICA HANNAH.

25. On or before June 13, 2001, defendant VERNELL DEVAN provided the name and telephone number of defendant MONICA HANNAH to Charmaine Mabry in order for HANNAH to obtain a Section 8 voucher through Charmaine Mabry.

26. On or about June 13, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant MONICA HANNAH.

27. On or after June 13, 2001, defendant MONICA HANNAH paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to HANNAH.

28. On or before July 12, 2001, defendant MONICA HANNAH referred defendant ALICIA SANCHEZ to Charmaine Mabry in order for SANCHEZ to obtain a voucher through Charmaine Mabry.

29. On or about July 12, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant ALICIA SANCHEZ.

30. On or after July 12, 2001, defendant ALICIA SANCHEZ paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to SANCHEZ.

31. On or about July 14, 2001, defendant KATISHA DEVAN leased 5137 Arch Street, 2<sup>nd</sup> Floor, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of defendant KATISHA DEVAN.

32. On or before July 23, 2001, defendant ALICIA SANCHEZ referred defendants CHARLES MOORE and KIM GIPSON to Charmaine Mabry in order for MOORE to obtain a voucher through Charmaine Mabry.

33. On or about July 23, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendants CHARLES MOORE and KIM GIPSON.

34. On or after July 23, 2001, defendant CHARLES MOORE paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to MOORE.

35. On or before August 2, 2001, defendant DORIS McCULLOUGH told defendant ERRICKA PENDER about Charmaine Mabry's scheme

36. On or before August 2, 2001, defendant ALICIA SANCHEZ referred defendant ERRICKA PENDER to Charmaine Mabry in order for PENDER to obtain a voucher through Charmaine Mabry.

37. On or about August 2, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant ERRICKA PENDER.

38. On or after August 2, 2001, defendant ERRICKA PENDER paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to PENDER

39. On or before August 3, 2001, defendant ALICIA SANCHEZ referred defendant DORIS McCULLOUGH to Charmaine Mabry in order for McCULLOUGH to obtain a voucher through Charmaine Mabry.

40. On or about August 3, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant DORIS McCULLOUGH.

41. On or after August 3, 2001, defendant DORIS McCULLOUGH paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to McCULLOUGH.

42. On or before August 10, 2001, defendant ERRICKA PENDER referred defendant TANYA WILLIAMS to Charmaine Mabry in order for WILLIAMS to obtain a voucher through Charmaine Mabry.

43. On or about August 10, 2001, Charmaine Mabry accessed the PHA database and made fraudulent entries so that Section 8 housing subsidies would be provided on behalf of defendant TANYA WILLIAMS.

44. On or after August 10, 2001, defendant TANYA WILLIAMS paid \$800 to Charmaine Mabry to cause a PHA Section 8 appointment letter to be issued to WILLIAMS.

45. On or about August 15, 2001, defendant CORETHA SNEED leased 1518 Etting Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of SNEED.

46. On or about August 24, 2001, defendant KEYSHARINA HURTT leased 5531 Oxford Avenue, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of HURTT.

47. On or about August 29, 2001, defendant ADRIENNE ALBRIGHT leased 1543 N. 60th Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of ALBRIGHT.

48. On or about September 1, 2001, defendant NICOLE GUIONS leased 132 S. 54th Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of GUIONS.

49. On or about October 11, 2001, defendant ALICIA SANCHEZ leased 5428 Euclid Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of SANCHEZ.

50. On or about October 19, 2001, defendant TANYA WILLIAMS leased 3911 Fairmount Avenue, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of WILLIAMS.

51. On or about October 23, 2001, defendant DORIS McCULLOUGH leased 2051 Gerritt Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of McCULLOUGH.

52. On or about November 15, 2001, defendant ERRICKA PENDER leased 439 Simpson Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of PENDER.

53. On or about November 15, 2001, defendant ISHTAR GADSON leased 5231 Addison Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of GADSON.

54. On or about December 1, 2001, defendant MONICA HANNAH leased 4317 Fairmount Avenue, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of HANNAH.

55. On or about December 14, 2001, defendant CHARLES MOORE leased 1331 Barnett Street, Philadelphia, Pennsylvania, which caused Section 8 housing subsidies to be paid on behalf of MOORE.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after May 14, 2001, in the Eastern District of Pennsylvania, the

defendant

CORETHA SNEED

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$7,704.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT THREE

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after May 29, 2001, in the Eastern District of Pennsylvania, the

defendant

ISHTAR GADSON

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,660.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT FOUR

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 4, 2001, in the Eastern District of Pennsylvania, the

defendants

MICHAEL ANDERSON  
NAKEISHA DAVIS

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$12,372.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).



COUNT FIVE

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 4, 2001, in the Eastern District of Pennsylvania, the

defendant

KATISHA DEVAN

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$5,369.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT SIX

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 8, 2001, in the Eastern District of Pennsylvania, the

defendant

NICOLE GUIONS

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$12,240.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT SEVEN

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 8, 2001, in the Eastern District of Pennsylvania, the

defendant

ADREINNE ALBRIGHT

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$8,628.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT EIGHT

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 12, 2001, in the Eastern District of Pennsylvania, the

defendant

KEYSHARINA HURTT

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$9,072.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT NINE

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after June 13, 2001, in the Eastern District of Pennsylvania, the

defendant

MONICA HANNAH

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,252.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT TEN

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after July 12, 2001, in the Eastern District of Pennsylvania, the

defendant

ALICIA SANCHEZ

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$7,925.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT ELEVEN

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after July 23, 2001, in the Eastern District of Pennsylvania, the

defendant

CHARLES MOORE  
KIM GIPSON

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,592.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT TWELVE

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after August 2, 2001, in the Eastern District of Pennsylvania, the

defendant

ERRICKA PENDER

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$6,561.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).



COUNT THIRTEEN

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after August 3, 2001, in the Eastern District of Pennsylvania, the

defendant

DORIS McCULLOUGH

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$7,370.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

COUNT FOURTEEN

1. Paragraphs 1 through 13 of Count One are realleged here.
2. On or after August 10, 2001, in the Eastern District of Pennsylvania, the

defendant

TANYA WILLIAMS

corruptly gave, offered, and agreed to give things of value, that is, a cash payoff, to Charmaine Mabry, an agent and employee of PHA, an organization which received benefits of over \$10,000 in a one-year period under a federal program involving a grant, subsidy, or other form of federal assistance, with intent to influence and reward Charmaine Mabry in connection with a business, transaction, and series of transactions of PHA involving anything of value of \$5,000 or more, that is Section 8 housing subsidies totalling at least \$9,150.

In violation of Title 18, United States Code, Section 666(a)(2) and (b).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
*United States Attorney*